

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 09/30/2020
2. Deadline for first request for production of documents and first request for interrogatories: 09/30/2020
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) N/A ; defendant(s) N/A
3. Date for completion of any joinder of additional parties and amendment of the pleadings: 11/30/20
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) 0 ; defendant(s) 0
4. Number of depositions by plaintiff(s) of: parties 2 ; non-parties TBD, but not to exceed the #permitted by the Fed. R. Civ. P. 30
5. Number of depositions by defendant(s) of: parties 0 ; non-parties 0
6. Date of status conference (joint status report due two business days in advance): To be set by the Court
7. Date for completion of factual discovery: 02/01/2021
8. Are expert witnesses needed? Yes TBD No 0
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical 0 ; non-medical 0
- 8(b). Date for completion of those expert reports: N/A
- 8(c). Number of expert witnesses, if any, of defendant(s): medical 0 ; non-medical 1
- 8(d). Date for completion of those expert reports: 01/15/2021
9. Date for completion of expert discovery: 01/29/2021
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): To be set by the Court
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: Summary Judgment
02/22/2021

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions:

Summary Judgment

02/22/2021

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.)

Not Applicable

Yes ☐ No ☐

14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.)

Yes ☐ No ☒

15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.)

Yes ☐ No ☒